

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SYSMEX CORPORATION and SYSMEX)	
AMERICA, INC.)	
)	C. A. No.: 19-1642-RGA-CJB
Plaintiffs,)	
)	JURY TRIAL DEMANDED
v.)	
)	
BECKMAN COULTER, INC.,)	
)	
Defendant.)	

**DEFENDANT BECKMAN COULTER, INC.'S MOTON TO STAY
THE CASE SCHEDULE PENDING THE DEPOSITION OF MASANORI IMAZU**

Defendant Beckman Coulter, Inc. ("BCI") hereby respectfully moves to stay the case schedule pending the deposition of Masanori Imazu. The bases for this motion to stay are set forth in BCI's letter brief, filed herewith.

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/s/ James L. Higgins

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Dated: August 11, 2021

Attorneys for Beckman Coulter, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SYSMEX CORPORATION and SYSMEX
AMERICA, INC.

Plaintiffs,

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C. A. No.: 19-1642-RGA-CJB

JURY TRIAL DEMANDED

**[PROPOSED] ORDER GRANTING DEFENDANT BECKMAN COULTER, INC.’S
MOTION TO STAY THE CASE SCHEDULE PENDING THE DEPOSITION OF
MASANORI IMAZU**

AT WILMINGTON, this _____ day of _____, 2021, the Court having considered Defendant Beckman Coulter, Inc.’s (“BCI”) August 11, 2021 Motion to Stay the Case Schedule Pending the Deposition of Masanori Imazu (the “Motion”): and the material submitted in support of and in opposition thereto;

Defendant’s Motion is GRANTED, and IT IS HEREBY ORDERED that:

1. The case be stayed until the deposition of Masanori Imazu has taken place.

United States Magistrate Judge

CERTIFICATE PURSUANT TO LOCAL RULE 7.1.1

I, Melanie K. Sharp, Esquire, hereby certify pursuant to Local Rule 7.1.1 that counsel for Beckman Coulter, Inc., (“BCI”) has made a reasonable effort, to reach agreement with counsel for Sysmex Corporation and Sysmex American, Inc. on BCI’s Motion to Stay the Case Schedule Pending the Deposition of Masanori Imazu. Such efforts include a meet-and-confer on July 9, 2021 which culminated into a discovery dispute hearing on August 3, 2021 where this Court invited BCI to file a motion to stay and detail why the motion should be granted.

/s/ James L. Higgins
James L. Higgins (No. 5021)

Dated: August 11, 2021